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BEFORE THE ARIZONA CORPORATION COMMISSION

CARL J. KUNASEK
Chairman

JIM IRVIN
Commissioner

WILLIAM A. MUNDELL
Commissioner

Arizona Corporation Commission
DOCKETED

APR 21 2000

DOCKETED BY	
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IN THE MATTER OF US WEST)
COMMUNICATIONS, INC.'S)
COMPLIANCE WITH SECTION 271)
OF THE TELECOMMUNICATIONS)
ACT OF 1996)

Docket No: T-00000A-97-0238

MCI WORLDCOM'S COMMENTS ADDRESSING SECTION 271
CHECKLIST ITEM 3 AND U S WEST'S SGAT PROVISIONS

MCI WorldCom, Inc. ("MWCom") agrees that it has reached agreement with U S WEST regarding the language contained in the SGAT, attached to U S WEST's rebuttal as *Exhibit 1*. However, MWCom and U S WEST are continuing to discuss the "U S WEST Pole and Attachment and/or Innerduct Occupancy General Terms and Conditions referenced in Paragraph 10.8.2.

Paragraph 10.8.2 provides:

U S WEST shall provide CLEC non-discriminatory access to poles, ducts, conduit and rights of way on terms and conditions found

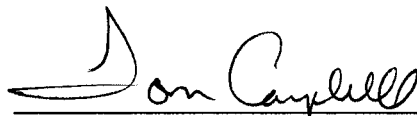
1 in the U S WEST Pole and Attachment and/or Innerduct Occupancy
2 General Terms and Conditions, attached hereto as Attachment I.
3 U S WEST will not favor itself over CLEC when provisioning
4 access to poles, ducts, conduits and rights of way. U S WEST
5 shall not give itself preference when assigning space.

6 Since this document is referenced in the SGAT, it is incorporated into the SGAT and
7 becomes a part of the SGAT. MWCom has proposed modifications to the U S WEST Pole and
8 Attachment and/or Innerduct Occupancy General Terms and Conditions to U S WEST in writing
9 that are being reviewed by U S WEST. Many of the proposed revisions conform the U S WEST
10 Pole and Attachment and/or Innerduct Occupancy General Terms and Conditions with language
11 now contained in the SGAT and are a result of recommendations made by MWCom and AT&T.
12 In addition, there is a separate dispute resolution process contained in the U S WEST Pole and
13 Attachment and/or Innerduct Occupancy General Terms and Conditions that is not consistent with
14 the dispute resolution procedures contained in the SGAT.

15 MWCom believes that U S WEST and MWCom will reach agreement on
16 modifications to the U S WEST Pole and Attachment and/or Innerduct Occupancy General Terms
17 and Conditions. However, in the event agreement cannot be reached, MWCom reserves the right
18 to address the U S WEST Pole and Attachment and/or Innerduct Occupancy General Terms and
19 Conditions in future pleadings in this 271 process.

20 Dated: April 21, 2000.

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ORIGINAL and ten (10) copies
of the foregoing filed this 21st
day of April, 2000 with:

Arizona Corporation Commission
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1200 W. Washington Street
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COPY of the foregoing hand-
delivered this 21st day of April,
2000, to:

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